

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

OPTIS WIRELESS TECHNOLOGY, LLC,  
OPTIS CELLULAR TECHNOLOGY, LLC,  
UNWIRED PLANET, LLC, UNWIRED  
PLANET INTERNATIONAL LIMITED,  
AND PANOPTIS PATENT MANAGEMENT,  
LLC,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Civil Action No. 2:19-cv-66-JRG

JURY TRIAL

**PLAINTIFFS' RESPONSE TO APPLE'S PROFFER**

Plaintiffs respond to Apple's "Offer Of Proof Regarding The Value Of Features Known In The Prior Art," Dkt. 673, to correct the record. Apple's Offer of Proof states that the Court prevented Apple from introducing evidence of prior art in this trial. That is not true. Apple affirmatively told the Court in Chambers that it did not seek to cross-examine Prof. Madisetti on the issue of prior art. This was Apple's strategic decision. There has been no final decision or order from this Court on the issue of prior art at this retrial that has prevented Apple from presenting evidence on this issue.

Dated: August 12, 2021

Respectfully submitted,

/s/ Jason Sheasby

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PANOPTIS PATENT MANAGEMENT,  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was served via electronic mail on all counsel of record on August 12, 2021.

/s/ Jason Sheasby

Jason Sheasby